

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (RDD)
Debtors. <sup>1</sup>	:	(Jointly Administered)
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**FOURTH SUPPLEMENTAL DECLARATION OF EDWARD DRUMMOND IN  
SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING RETENTION  
AND EMPLOYMENT OF BEDELL CRISTIN JERSEY PARTNERSHIP  
AS SPECIAL FOREIGN COUNSEL, NUNC PRO TUNC TO FEBRUARY 27, 2020**

I, Edward Drummond, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury as follows:

1. I am a partner of the law firm of Bedell Cristin Jersey Partnership,<sup>2</sup> which maintains offices for the practice of law at 26 New Street, Saint Helier, Jersey E2 3RA.
2. I am familiar with the matters set forth herein and make this supplemental declaration (the “Supplemental Declaration”)<sup>3</sup> in connection with the *Application of the Official*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014).

<sup>2</sup> As set forth herein, the Committee requires the services of Bedell Cristin Cayman Partnership, a partnership affiliated with Bedell Cristin Jersey Partnership, Bedell Cristin Guernsey Partnership and Bedell Cristin BVI Partnership which maintains offices for the practice of law at 18 Forum Lane, Suite 5305, 3rd Floor, Camana Bay, PO Box 1990, Grand Cayman KY1-1104, Cayman Islands. Such partnerships are collectively referred to herein as “Bedell Cristin.” For the avoidance of doubt, Bedell Cristin’s retention by the Committee shall be expanded to include Bedell Cristin Cayman Partnership in addition to Bedell Cristin Jersey Partnership, Bedell Cristin Guernsey Partnership and Bedell Cristin BVI Partnership.

<sup>3</sup> Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Application.

*Committee of Unsecured Creditors for Entry of an Order Authorizing Retention and Employment of Bedell Cristin Jersey Partnership as Special Foreign Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to February 27, 2020 [ECF No. 1244] (the “Application”),<sup>4</sup> my initial declaration attached thereto as Exhibit B, the *Supplemental Declaration of Edward Drummond in Support of the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing Retention and Employment of Bedell Cristin Jersey Partnership as Special Foreign Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to February 27, 2020* [ECF No. 1905], the *Second Supplemental Declaration of Edward Drummond in Support of the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing Retention and Employment of Bedell Cristin Jersey Partnership as Special Foreign Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to February 27, 2020* [ECF No. 2152] and the *Third Supplemental Declaration of Edward Drummond in Support of the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing Retention and Employment of Bedell Cristin Jersey Partnership as Special Foreign Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to February 27, 2020* [ECF No. 3060].*

3. As set forth in the Application, to the extent the Committee requires Bedell Cristin to provide additional services that differ materially from those described in the Application, Bedell Cristin committed to file a supplemental declaration in accordance with Bankruptcy Rule 2014 disclosing both the nature of its expanded employment and the reasons supporting its additional

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<sup>4</sup> The Court granted the Application on June 29, 2020. *Order Authorizing Employment and Retention of Bedell Cristin Jersey Partnership as Special Foreign Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to February 27, 2020* [ECF No. 1310].

duties and responsibilities. *See Application ¶ 20.* Accordingly, I submit this Supplemental Declaration to provide the additional disclosures set forth herein.

**Scope of Bedell Cristin's Services**

4. As set forth in the Application, the Committee has been engaged in an extensive investigation of potential claims and causes of action belonging to, and for the benefit of, the Debtors' estates, including potential actions against members of the Sackler family (the Debtors' ultimate equity holders). These efforts have involved, among other things, identifying the amount, location and availability for recovery of assets owned directly or indirectly by members of the Sackler family. As set forth in the Application, the Committee sought to retain Bedell Cristin Jersey Partnership to provide certain foreign law services related to issues arising under the law of the Bailiwick of Jersey in connection with the Committee's investigation, including advising on potential tolling agreements with respect to the Sacklers and their Jersey-based trusts and related efforts to collect against assets held in such trusts. *See Application ¶ 18.*

5. Recently, the Committee encountered additional issues arising under other foreign law in connection with potential proceedings against the Sackler family and certain related entities, including issues arising under Cayman law. Examination of assets held in Cayman-based trusts and/or accounts and related issues arising under Cayman law is critical to investigating any potential claims that the Committee may wish to bring against the Sackler family and certain related entities.

6. Accordingly, the Committee requires Bedell Cristin's assistance with respect to such issues arising under Cayman law. Bedell Cristin will continue to render other services for the benefit of the Committee in accordance with the Application and the Retention Order.

### **Bedell Cristin's Qualifications**

7. As set forth in the Application, the Committee selected Bedell Cristin to serve as special foreign counsel due to its expertise in BVI, Cayman Islands, Guernsey and Jersey law and its regular work alongside preeminent international law firms on a broad range of matters. Application ¶ 16. Bedell Cristin is particularly well suited to provide the services requested because of its substantial expertise in commercial litigation, fraud, asset tracing and cross-border insolvency. *Id.* Accordingly, I believe Bedell Cristin is well-positioned to provide the foregoing additional services to the Committee during the Chapter 11 Cases.

### **Bedell Cristin's Rates and Billing Practices**

8. Bedell Cristin will continue to apply for compensation for professional services rendered in connection with the Chapter 11 Cases subject to the approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Bankruptcy Rules, and Orders of the Court entered in the Chapter 11 Cases concerning compensation of professionals, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Bedell Cristin. The current rates of partners and associates in Bedell Cristin's Cayman office are as follows:

<b><u>Professional</u></b>	<b><u>Rates</u><sup>5</sup></b>
Partners	\$850
Senior Associates	\$550
Associates	\$375 - \$525

9. These rates are subject to change in accordance with Bedell Cristin's billing practices and procedures. Bedell Cristin will file a supplemental declaration with this Court and give not less than ten (10) business days' notice to the Debtors, the U.S. Trustee, and the

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<sup>5</sup> These rates came into effect on March 1, 2022 as part of Bedell Cristin Cayman Partnership's customary review and implementation of rate changes over time.

Committee prior to implementing any increases in the rates set forth herein in the Chapter 11 Cases.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 25, 2022

Bedell Cristin Jersey Partnership

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